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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10

11 ANDI KRAJA, an individual;

Case No. 2:15-cv-01983-APG-NJK

12 Plaintiff,

13 vs.

14 BELLAGIO, LLC, a Nevada Corporation;  
15 VINCENT ROTOLI, an individual; ROE  
16 Business Organizations I-X; and DOE  
17 INDIVIDUALS I-X, Inclusive,

**DEFENDANT BELLAGIO, LLC'S  
PROTECTIVE NOTICE OF APPEAL**

Defendants.

18 Notice is hereby given that Defendant Bellagio, LLC, ("Defendant" or "Bellagio") by and  
19 through its attorneys, Pisanelli Bice, PLLC, hereby appeals to the United States Court of Appeals  
20 for the Ninth Circuit from the following: Judgment in a Civil Case (ECF No. 203), and all other  
21 decisions and orders made appealable therefrom, including, without limitation:

- 22 1. Defendants' Amended Proposed Jury Instructions (ECF No. 183)  
23 2. Jury Instructions (ECF No. 198)  
24 3. Jury Verdict (ECF No. 202)  
25 4. Bill of Costs (ECF No. 207)

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1                   Bellagio acknowledges that this Notice of Appeal may be premature in light of Bellagio's  
2 pending post-trial Motion (ECF No. 214) before the District Court. However, Bellagio files this  
3 Protective Notice of Appeal out of an abundance of caution to preserve all rights.

4                   DATED this 3rd day of May, 2019.

5                   PISANELLI BICE PLLC

6                   By: /s/ Todd L. Bice  
7                   Todd L. Bice, Esq., Bar No. 4534  
8                   Robert A. Ryan, Esq., Bar No. 12084  
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11                   *Attorneys for Defendant, Bellagio LLC*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 3rd day of May, 2019, I caused to be served via the Court's CM/ECF service system a true and correct copy of the above and foregoing **DEFENDANT BELLAGIO, LLC'S PROTECTIVE NOTICE OF APPEAL** to the following:

James P. Kemp, Esq.  
Victoria L. Neal, Esq.  
Kemp & Kemp, Attorneys at Law  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130

*Attorneys for Plaintiff*

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*/s/ Christi Colucci*  
An employee of PISANELLI BICE PLLC

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